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July 13, 2023

Via ECF

The Honorable J. Paul Oetken
United States Courthouse
500 Pearl Street, Room 2101
New York, NY 10007

Re: *Jackson v. American Civil Liberties Union, et al.*
Case No. 1:21-cv-05037-JPO

Dear Judge Oetken:

We represent Defendants in the above-captioned action. We submit this letter motion, jointly with Plaintiff, to respectfully request an extension of the parties' expert discovery deadline. Due to various scheduling conflicts, the parties and experts have not been able to find mutually agreeable dates to ensure completion of expert discovery before August 4, 2023, the current deadline set by the Court. However, the parties and experts have diligently coordinated their availability and have jointly put together the expert discovery schedule below. We therefore respectfully request that the relevant deadlines be set forth/extended as follows:¹

- Defendants' In-Person IME of Plaintiff: July 17 and 18, 2023
- Deadline to Exchange Expert Reports: August 25, 2023
- Deadline to Exchange Rebuttal Reports: September 13, 2023
- Expert Discovery Deadline: from August 4, 2023 to October 20, 2023
- Joint status letter to the Court: from August 18, 2023 to November 3, 2023

This is the parties' first request for an extension of the current expert discovery deadline. Thank you for your consideration in this matter.

¹ Please note that dates for Plaintiff's IME, Exchange of Expert Reports, and Exchange of Rebuttal Reports were not previously set by the Court. The parties have established these deadlines amongst themselves.



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Respectfully submitted,

KAUFF MCGUIRE & MARGOLIS LLP

/s/ Tamanna Rubya
Tamanna Rubya

cc: All Counsel of Record (via ECF)